

Farr v. Valentine, 38 App., D.C. 413 (1912).

This is a suit for libel by an employee against the Commissioner of Indian Affairs of the Department of the Interior. The suit arises over statements made in a letter from the Commissioner to the Secretary of the Interior recommending dismissal of the employee on the grounds of unfitness. The Court in this case followed the ruling of the Vilas and Ainsworth cases. The Court pointed out that while the defendant, as Commissioner, could not remove the plaintiff, it was in the line of his duty to make recommendation to that end to the Secretary. The occasion, therefore, was held to be privileged.